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*Attorney in pro se and as Counsel for
the Plaintiffs upon approval of Pro
Hac Vice admission*

EVELYN ADAMS, Plaintiff

c/o **PHILIP J. BERG, ESQUIRE**

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*In Pro Se, Pending Mr. Berg's Pro
Hac Vice Admission*

LISA OSTELLA, and GO EXCEL GLOBAL, Plaintiffs

c/o **PHILIP J. BERG, ESQUIRE**

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LISA LIBERI, Plaintiff

c/o **PHILIP J. BERG, ESQUIRE**

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Hac Vice Admission*

**U.S. DISTRICT COURT, NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

LISA LIBERI, et al,

Plaintiffs,

vs.

LINDA SUE BELCHER, et al,

Defendants.

CIVIL ACTION

Case No. 2:11-cv-00090-J

Honorable Mary Lou Robinson

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANT
EDGAR HALE’S MOTION TO REJECT PLAINTIFFS OPPOSITION TO
DEFENDANT HALE’S MOTION TO DISMISS**

TO THE HONORABLE COURT:

Plaintiffs Philip J. Berg, Esquire, in pro se and as Counsel for the Plaintiffs upon *Pro Hac Vice* admission, and Plaintiffs Evelyn Adams, Lisa Liberi, Lisa Ostella, Go Excel Global and the Law Offices of Philip J. Berg [“Plaintiffs”] and files the within Response in Opposition to Defendant Edgar Hale’s [hereinafter at times “Defendant” or “Hale”] Motion to Reject [“MTR”] Plaintiffs Response in Opposition to Defendant Hale’s Motion to Dismiss. In support hereof, Plaintiffs avers as follows:

1. Defendant’s Motion to “Reject” is improper and in compliant with the Federal Rules of Civil Procedure 7(a)(B); and this Court’s Local Rules 7.1(a); 7.1(b); 7.1(d); and 7.2 and therefore, should be stricken.

2. Being that Defendant failed to provide a Brief or Memorandum of Points and Authorities based on any case law or statutes relied upon, Plaintiffs can only assume Defendant is attempting to file a Motion to Strike pursuant to Fed. R. Civ. P. 12(f).

3. Mr. Berg is a pro se Plaintiff herein and all Plaintiffs have jointly worked together on the filings, and have given full authorization for their electronic signatures on the pleadings filed.

WHEREFORE, for the reasons outlined herein and in Plaintiffs Memorandum of Points and Authorities, Plaintiffs respectfully Request this Court to Deny Defendant Edgar Hales Motion to Reject.

Respectfully submitted,

Dated: August 30, 2011

/s/ Philip J. Berg
PHILIP J. BERG, ESQUIRE
*Attorney in pro se and as Counsel for the
Plaintiffs upon approval of Pro Hac Vice
Admission*

The Following Plaintiffs in Pro Se pending Mr. Berg's Pro Hac Vice Admission, join in this Opposition to Defendant Edgar Hale's Motion to Reject Plaintiffs Opposition to Defendant Hale's Motion to Dismiss; and have given full permission for their electronic signature to be input on the within document. Further, Mr. Berg maintains in his office, the originally signed copies by each of the following Plaintiffs:

Dated: August 30, 2011

/s/ Evelyn Adams 
EVELYN ADAMS, Plaintiff

Dated: August 30, 2011

/s/ Lisa Ostella 
LISA OSTELLA, and
GO EXCEL GLOBAL, Plaintiffs

Dated: August 30, 2011

/s/ Lisa Liberi 
LISA LIBERI, Plaintiff